

RONALD A. GILLER, ESQ.  
RGILLER@GRSM.COM  
DIRECT DIAL: 973-549-2501

MALLORY J. BENNER, ESQ.  
MBENNER@GRSM.COM  
DIRECT DIAL: 973-549-2555

**GORDON & REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER™**

ATTORNEYS AT LAW  
1 BATTERY PARK PLZ  
NEW YORK, NY 10004  
[WWW.GRSM.COM](http://WWW.GRSM.COM)  
(973) 549-2500

November 1, 2023

**VIA ECF AND E-MAIL**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

**Re: Charles Johnson v. Clearview AI, Inc., et. al.**  
**Case No. 1:23-cv-02441**

Dear Judge Failla:

As you know, since the inception of this case, Defendants have continuously requested for Plaintiff to cease publishing offensive, inappropriate comments via social media about the Defendants and Defendants' counsel. After multiple objections to Plaintiff's inappropriate conduct went unheeded, as communicated to Plaintiff's counsel in March and May of this year, Defendants were forced to seek judicial intervention in July in response to Plaintiff's threatening communications to Clearview's investors and board members and published an antisemitic "tweet" regarding Defendants' counsel. Your Honor noted the Court's concern about the contents of the tweet and questioned whether it was Plaintiff's intent to use his social media platform to intimidate defense counsel or otherwise interfere with this lawsuit. Plaintiff's counsel filed a written response where he represented that, upon receiving Defendants' objections, he also made the same requests of Plaintiff to refrain from engaging in such conduct, to no avail, but that Plaintiff "now appreciates the impact of his statements" and has agreed to stop engaging in this inappropriate conduct.

Despite Defendants' continuous objections, direction from Plaintiff's own counsel, and his explicit representations to the Court, Plaintiff has continued to publish harmful, offensive and untrue comments about Defendants online in a clear campaign of harassment against the Defendants. Most recently, on October 30, 2023, Plaintiff published the attached tweets on X.com (formerly Twitter), where he falsely claimed that Defendant Hoan Ton-That, Clearview's Chief Executive Officer, was a victim of child sexual abuse. In the same thread of tweets, Plaintiff references "foreign ops, chiefly from Israel" in relation to Clearview. These false statements, viewed in the context of Plaintiff's previous public online communications, can only be viewed as a part of a repeated pattern whereby Plaintiff harasses Clearview and its counsel by making untrue, offensive, conspiratorial and anti-Semitic claims. The seriousness of these statements has forced Defendants to reiterate their request for judicial intervention, as it is clear

Plaintiff is using his social media platform as a means to publicly harass and intimidate the Defendants, and interfere with this lawsuit. Therefore, we respectfully request the Court to direct Plaintiff to stop posting offensive comments about Defendants, including Defendants' counsel, on public, online platforms, and take any other action that the Court deems as just.

Thank you.

Respectfully Submitted,

GORDON & REES LLP

*/s/ Ronald A. Giller*

Ronald A. Giller, Esq.

RAG:MJB  
Enclosures

# Exhibit A

20:08

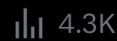


## Post


**Charles Johnson's Thoughts & Ad...** · 3h · ...

While we are on the topic of child molestation & covering it up I do find it very interesting that I discussed my experience of child abuse with @kashhill but it oddly didn't make her book. It colors things if I am a survivor of child abuse working in facial recognition.

A


**Charles Johnson's Thoughts & Ad...** · 3h · ...

My abuser was my manic depressive uncle. You can read about him in his obituary here. [legacy.com/us/obituaries/...](https://legacy.com/us/obituaries/...)

To this day his siblings — my aunts and uncles — deny it happened. It's extremely painful.

I wasn't alone though.

I told Kashmir all about it.



ERIC LUNDQUIST Obituary  
(1959 - 2018) - Dorchester,...  
[legacy.com](https://legacy.com)


**Charles Johnson's Thoughts & Ad...** · 3h · ...



20:08


**Charles Johnson's Thoughts & Ad...** · 3h ...

I spoke with Hill a lot for her book which is becoming a civil liberties tome but Uncle Eric didn't make the cut.

Even Hill admits that the best use case of facial rec is protecting kids.

Hoan was also a victim of child abuse. We discussed it often when we built Clearview.

1 10 414


**Charles Johnson's Thoughts & Ad...** · 3h ...

I understand that it's easier for the media to smear me as alt right this or that or whatever. Even though I am a Biden supporter and even though it's been credibly reported that I was a federal informant somehow that never makes the compromised press. Why is that?

1 10 383


**Charles Johnson's Thoughts & Ad...** · 3h ...

Anyway I suspect a major reason Hoan & I were split up by foreign ops, chiefly from Israel, was because we made a very powerful combination. Indeed it's only when I reported about Israeli ops to the FBI that our relationship cooled. No worries. The federal courts are on it. 🇺🇸

1 1 13 379


**Charles Johnson's Thoughts & Ad...** · 3h ...

Post your reply



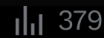
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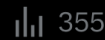
 379

**Charles Johnson's Thoughts & Ad...** · 3h ...

Hoan has allowed the abuse he suffered to make him socially avoidant and to avoid doing the right thing. Unfortunately that's not been good for him or the company.

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 355

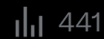
**Charles Johnson's Thoughts & Ad...** · 3h ...

For reporters I get that it's easier to smear me or whatever than to take seriously how my own experiences and fatherhood made it so that I wanted to build a world safe for children. Look closely and you'll see it in everything I do.

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 441

**Charles Johnson's Thoughts & Ad...** · 3h ...

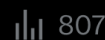
You'll see in all my work a desire to stand up for the weak. It inspires my faith and guides my politics.

But in truth I am really standing up for myself. It's long overdue.

If it seems I'm going hard these days it is because I wish someone had for me.

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 16

 807

**Charles Johnson's Thought...**
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@JohnsonThought1



20:08



## Post

**Charles Johnson's Thought...**

Follow



@JohnsonThought1

I want to thank [@phuckphilosophy](#) for speaking out about her abuse at the hands of a close family member and inspiring me to speak up too.

16:16 · 10/30/23 from Earth · **800** Views**12** Likes**AngryMFFer2** @AngryMFFer2 · 3h

I am truly sorry your Uncle Eric abused you. You didn't deserve it (neither did my kid bro being abused by a demonic sexual deviant neighbor). The flashbacks occur -- it causes severe mistrust & tarnishes good relationships. Thk you for being brave enough to talk about it 🙌🌸



114



Post your reply

